

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TEXTRON INNOVATIONS INC.,

Plaintiff,

v.

Case No. 2:22-CV-00351-RWS-RSP

SZ DJI TECHNOLOGY CO., LTD.,  
DJI EUROPE B.V., SZ DJI BAIWANG  
TECHNOLOGY CO. LTD., and iFLIGHT  
TECHNOLOGY COMPANY LTD.,

Defendants.

**DECLARATION OF CATHERINE NYARADY**

1. I am a partner at Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul, Weiss”).  
2. I have been retained by SZ DJI Technology Co., LTD., DJI Europe B.V., SZ DJI  
Baiwang Technology Co. LTD., and iFLIGHT Technology Company LTD. (collectively “DJI”)  
for the purpose of representing DJI in the above-captioned matter (“the Litigation”).

3. This declaration is submitted in support of DJI’s application for a protective order  
relating to the production of [REDACTED]

[REDACTED]

[REDACTED]

4. On May 23, 2023, counsel for the parties had a lengthy discussion regarding the  
production of source code by Zoom conference.

5. During this conference, counsel discussed certain specific issues relating to [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

6.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

7.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

8. Moreover, we offered [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

9. TII's counsel flatly rejected DJI's offers. TII's counsel did so based on their expressed view that to review the code at this point in time may [REDACTED]

[REDACTED] They refused to meaningfully engage in any discussion directed towards [REDACTED]

[REDACTED]

10. Despite acknowledging [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] TII's counsel still demanded production of the code on June 5, 2023.

11. TII's counsel repeatedly suggested, improperly, that the source code issue had already been decided and resolved in the case before the Western District of Texas.

12. Attached as Exhibit A is a true and correct copy of the [REDACTED]

[REDACTED]

13. Attached as Exhibit B is a true and correct copy of a certified translation of the [REDACTED]

[REDACTED]

14. Attached as Exhibit C is a true and correct copy of the [REDACTED]

[REDACTED]

15. Attached as Exhibit D is a true and correct copy of a certified translation of the [REDACTED]

[REDACTED]

16. Attached as Exhibit E is a true and correct copy of DJI's P.R. 3-4(a) June 5, 2023 production correspondence.

17. DJI sought consent from TII for the relief requested in the present motion. TII refused.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 5, 2023.

/s/ Catherine Nyarady  
**CATHERINE NYARADY**